Date:29 May 1998 Cynthia L. Hutchison, Environmental Engineer RCRA Enforcement and State Programs Branch U.S. Environmental Protection Agency 726 Minnesota Avenue Kansas City, Kansas, 66101



Dear Ms. Hutchison,

In response to the letter from the U.S.E.P.A. dated May 14,1998, Request for Information.

(Ref. Willert Home Products E.P.A. Inspection of October 28th & 29th 1997)

I deeply apologize for the "time lapse" since my last abatement letter to your organization and the receipt of your "Request for Information" letter.

Listed below you will find our Abatements to the Information Requested:

- Item 1. Describe the process identified in your December 3, 1997, letter as "steam filtering of spent activated charcoal. (See Exhibit A)
- Item 2. Identify dates of steam filtering and quantities of material steamed.(See Exhibit B)
- Item 3. Provide a copy of any and all test results from all sampling conducted on the charcoal filter media before steam filtering and the charcoal filter media and the steam water after steam filtering. (See Exhibits C-1 and C-2)
- Item 4. Describe what was done with the charcoal filter media and the steam water from the steam filtering waste treatment process. (See Exhibit D)
- Item 5. Provide documentation, in the form of manifests or other shipping documents where applicable, for all offsite shipments of charcoal filter media and steam water from the steam filtering waste treatment process. (See Exhibit E)

Again, I apologize for the delay. If you have any questions, please feel free to contact me at anytime, at (314)772-2822 ext.338.

00180504

RCRA RECORDS CENTER

Safety Director



JUN 0 1 1998

#### **EXHIBIT A**



The sample (for Lab Analysis) steam filtering process of the activated charcoal consisted of the drilling of an 1" air vent hole/ steam condensation relief opening into the bottom of 55 gallon D.O.T. open top metal drum. An adapter for a steam hose connection was welded to the top of the metal lid for this drum. A "Star-type" manifold was affixed to the underside of the drum lid to assure complete steam absorption through-out the activated charcoal. A metal catch-pan was placed under the raised drum to catch the steam/water condensation. The steam filtering process was run approximately four (4) hours on this drum. This process produced approximately 2 gallons of condensation steam/water which was, (after cooling), placed back into our Charcoal Filter air purification tanks on the 3rd floor of para production. This "trial run" was conducted on November 20 1997. After drum was permitted to cool, a "grab sample" was withdrawn near the middle section of the drum and was submitted to Bodycote Laboratory for testing on November 21, 1997.



JUN 0 1 1998 RESP

#### **EXHIBIT B**



On the date of November 20, 1997 we steam filtered one (1) drum of activated charcoal. The net drum weight was 250 lbs.

JUN 0 1 1998



MATERIALS TESTING ◆ ST. LOUIS LABORATORY

RESP

METAL TECHNOLOGY

BODYCOTE INDUSTRIAL TESTING LTD. - 2350 SOUTH 7TH STREET, ST. LOUIS, MISSOURI 63104-4296 • TEL (314) 771-7111 • FAX (314) 771-9573

Report No. 97-10-05129

November 6, 1997

Examination of one (1) Activated Charcoal sample submitted 10/30/97.

Willert Home Products 4044 Park Avenue St. Louis, MO 63110

P.O.: 329675

Attn: Mr. Jim Smith

#### TEST REPORT

Sample Identification:

Activated Charcoal w/p-Dichlorobenzene

(BITL #290646)

EXHIBIT C-I

Test

Result (mg/L)

p-Dichlorobenzene

9.4

(TEST RESULTS PRIOR TO SAWALE BEING STEAM FILTER)

Symbol "mg/L" denotes milligrams per Liter or parts per million (ppm).

Test Method: SW 846 8260

Method Reference: Test Methods for Evaluating Solid Waste, 3rd. Edition,

USEPA, January 1995.

Results pertain to only those items submitted for testing.

Respectfully Submitted,

INDUSTRIAL TESTING LABORATORIES, INC.

By:

William A. Rorie Vice President

Faxed: 11/5/97 LB - 74943 MP/MRH/kg

Inv. #12422



JIM SMITH
Willert Home Products
4044 Park Avenue
St. Louis,Mo. 63110

21 November 1997

Joann Heiman (RPCB) U.S.E.P.A. 726 Minnesota Avenue Kansas City, Kansas 66101 ATTENTION: ARTD

Dear Mrs. Heiman,

This is a follow-up report, in response to the U.S.E.P.A. random inspection of the Willert Home Products' facility on the dates of 28 October and 29 October 1997.

1.) 10CSR25-5.262(1)

40CFR 262.11

Make a waste determination on the spent activated charcoal.

ABATEMENT: We have steam cleaned/filtered a portion of this waste stream. I have sent a sample of this waste stream to Industrial Testing Labs. to have another TCLP performed. (See attached P.O.). I will send you the results upon receipt.

If you have any questions, please feel free to call me at anytime at 1-314-772-2822.

Jim Smith Safety Director

cc: Sue Hantak Jim Nehrt Joe Adamo Phil Wells

# 4044 PARK AVE. ST. LOUIS, MO 63110

(314) 772-2822 FAX (314) 772-3238

PROJECT #\_\_\_\_\_\_\_\_O

COST CENTER:

G.L.#\_

ILA

**SUPPLIER** 

## PUL HASE ORDER **NUMBER**

329882

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SPEC	IAL NOTE!						
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EPA LEQUEST.

☐ YES

. **□NO** 

**EQUIPMENT #:** 

TAXABLE?

SIGNED BY:

APPROVED:

## WILLERT HOME PRODUCTS

03 December 1997

Joann Heiman (RPCB) U.S.E.P.A. 726 Minnesota Avenue Kansas City, Kansas 66101 ATTENTION: ARTD

Dear Mrs. Heiman,

This is a follow-up report, in response to the U.S.E.P.A. random inspection of the Willert Home Products' facility on the dates of 28 October and 29 October 1997.

1.) 10CSR25-5.262(1)

40CFR 262.11

Make a waste determination on the spent activated charcoal.

ABATEMENT: We have steam cleaned/filtered a portion of this waste stream. I have sent a sample of this waste stream to BodycoteTesting Labs. to have another TCLP performed.I will send you the results upon receipt.

RESULTS: I have received the results from the Lab on 03 December 1997. As you can see, after steam-cleaning of the spent waste the p-Dichlorobenzene content has dropped to 0.51 mg/L with the Regulatory limits set at 7.5 mg/L. All of these drums will be steam filtered and disposed of in accordance with State and Local laws by February 1, 1998.

If you have any questions, please feel free to call me at anytime at 1-314-772-2822.

Jim Smith Safety Director

cc: Sue Hantak Jim Nehrt Joe Adamo Phil Wells



## MATERIALS TESTING + ST. LOUIS LABORATORY

METAL TECHNOLOGY

BODYCOTE INDUSTRIAL TESTING LTD. • 2350 SOUTH 7TH STREET, ST. LOUIS, MISSOURI 63104-4296 • TEL (314) 771-7111 • FAX (314) 771-9573

Report No. 97-11-05580

November 26, 1997

Examination of one (1) Granular Activated Charcoal sample submitted 11/21/97.

Willert Home Products 4044 Park Avenue St. Louis, MO 63110

P.O.: 329882

Attn: Mr. Jim Smith

#### **IEST REPORT**

Sample Identification:

Granular Activated Charcoal

After Steaming (BItL No. 292424)

**Test** 

Result

TCLP:

(mg/L)

----

p-Dichlorobenzene

0.51

Symbol "mg/L" denotes milligrams per Liter or parts per million (ppm).

Test Method: SW-846 8260

Method Reference:

Test Methods for Evaluating Solid Waste, 3rd, Edition,

USEPA, January 1995.

Results pertain to only those items submitted for testing.

Respectfully Submitted,

BODYCOTE INDUSTRIAL TESTING LTD.

Ву:

William A. Rorie Vice President

LB - 74984 MRH/MP/ps/kg DEC-02-1997 10:55

Inv. #12850

3147719573



JUN 0 1 1998

#### **EXHIBIT D**



For description of disposal to charcoal and steam water see EXHIBIT A.

NOTE: This was the only drum that was steam filtered. Upon evaluation of this process, it was determined that it would not be cost effective and we could not meet the February 1, 1998 steam filtering and disposal date previously projected. Based on steam filtering one drum per day (55 drums total):

**December 1997.....12 drums** 

January 1998......20 drums

32 drums total by February 1, 1998

(COST ANALYSIS)

Laboratory TCLP analysis per steam filtered drum... $$175.00 \times 54 = $9,450.00$ Labor hrs. steam filter and recycle charcoal & water.  $$50.00 \times 54 = $2,700.00$ Disposal cost to Special waste landfill......\$4000.00 roll-off container
Labor to fill roll-off container.....\$100.00

\$16,250.00 TOTAL

(vs)

\$13,000.00 to have disposed of as a Hazardous Waste



REC'D
JUN 0 1 1998
RESP

#### **EXHIBIT E**



After cost analysis was reviewed, the decision was made to have Charcoal waste disposed of as a Hazardous Waste. (See attached Manifest)

## **DUS WASTE MANIFEST**

Hazardous Waste Program
P.O. Box 176 Jefferson City, Missouri 65102
573-751-3176

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS. INSTRUCTIONS FOR THE COMPLETION OF THIS FORM ARE ON A SEPARATE SHEET.

EMERGENCY RESPONSE

U.S. COAST GUARD 1-800-424-8802

CHEM TREC 1-800-424-9300 DEPT. OF NATURAL RESOURCES 573-634-2436

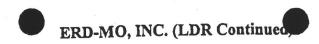
GENFRATOR COPY - PART 6

TINDORTANIT

SEE INSTRICTIONS SHOULD PART 1 & 2 FAIL TO RETURN

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID MCOCO 289689		Man	ifest ent No.	2. Page of _			the shaded areas
24.33	eil Hone Fronkels 4 Park Ave. Louis MC	1 63110-			00	uri Manifest Documer		002
4. Generator's Phone ( (314) 172 2822		x 6	2 2	* (* s		(104,3)	n	
Able Transportation inc	6. U	S EPA ID Number	144		C. MO. Tr	ans. ID orter's Phone	<del>10) / 7</del>	5 1330 °;
Transporter 2 Company Name	. 8. U	IS EPA ID Number			E, MO, Tr	ans. ID orter's Phone	4.4	
Designated Facility Name and Site Address ERD-MO INC	10.	US EPA ID Number			G. State	Facility's ID ()0327		
3100 Indiastrial Fuel Drive Seoil City MO (	63780	MOTWARGO	154		H. Facility	's Phone (*)7*)	951 3	144
1. US DOT Description (Including Proper Shipping Nan	ne, Hazard Class, ID Number and	d Packing Group (if any	1 21 4	2. Containe		13. Total	14. Unit	I. Waste No.
Huzardous Waste, Solids, n.o.s. (p. Dich	ikwohenzene)			Number	Туре	Quantity	Wt/Vol.	EPA WASTE CODE
9 NA3077 POBI RO(D027)			6	150	DM	2,750	G	STATE
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			1 H	1 1		<u>_r                                    </u>	955	L L L L L L L L L L L L L L L L L L L
				1 1 1 1 2 X				STATE
Additional Descriptions for Materials Listed Above		80-1.0	N.	NOLING CODE INTERIM	FACILITY USE	ONLY) FINAL	en e ent.	COMMENTS
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			c.	3430		1 2 1	73	# 15 (15 (15 (15 (15 (15 (15 (15 (15 (15
5. Special Handling Instructions and Additional Information	ition					Traffer Licenses i	MI	78-0190
Emergency Response #314 508-2690 H	ız-Wasta, Inc	ERG# 171				State	M	U
6. GENERATOR'S CERTIFICATION: I hereby declare the and are in all respects in proper condition for transport I I am a large quantity generator, I certify that I have have selected the practicable method of treatment, squantity generator, I have made a good faith effort to	ort by highway according to applic a a program in place to reduce the torage, or disposal currently avail	able international and re e volume and toxicity or able to me which minin	ational govern waste general izes the prese	ment regulated to the denterment to the denterme	ations and legree I have threat to	applicable state regulate applicable state regulate to be human health and to	ulations. economi	cally practicable and
Printed/Typed Name Swith		Signature	4-15	mi	th	,		Month Day
7. Transporter 1 Acknowledgement of Receipt of Materi	-11	Signature	87	d	ure	11		Month Day
Transporter 2 Acknowledgement of Receipt of Material     Printed/Typed Name	iais	Signature						Month Day
Discrepancy Indication Space								
0. Designated Facility Owner or Operator: Certification	of receipt of hazardous materials	covered by this manife	st except as no	ted in Item	19.			Date
Printed/Typed Name	r in the state of the s	Signature	343 3-1	, district	<i>3</i> 74		W (2 150)	Month Day

No.		LAND DISPOSAL RESTR	ERD-MO,		NOTIF	ICATION FORM	ń	1690	
A. Generator		Hert Home Products 044 Park Ave 1 Louis MO 6311	_	US EP	A ID# ifest #	MOD 00 			
B. 🗆 (Check	if applicable)	T COMIS ME SON	<u> </u>	MIO. 1 1011.	10 m(3)	<u> </u>	3-01		
Restricted Waste	contained in this ship	pment and referenced by the above Mar	nifest number th	at are lister	i below are	subject to the treatm	nent standards s	et forth in 40 CI	FR 268.40
For each waste o	ode, list the correspon	ading Subcategory, if applicable. Reco	rd an "X" in the	appropria	te column	below for Treatability	Group and ea	ch disclosure for	m attache
(1) Profile Numb	(2) USEPA Hazardous Waste Code	(3) Subcategory (if applica	ible)		atability up* WW	(5) F001-F005 Disclosure Form Attached	(6) UTS Disclosure F Attached	orm 40 CF	R 268
C5103-0				×		7.2000.700	×	149	
				-					
								•	
				<del> </del>					
(*) Include drum	number if this waste	pertains to a lab pack.					<u> </u>		*
C									
. Г		California List Constitu	ents and their Pr	rohibition I	evels			* .:	
	Profile Number	USEPA Hazardous Waste Code		Constitu			ntration		
1.		1	☐ Liquid wa	stes contai	ning Nicke	4	mg/L	;	
		1. 11 a sab	☐ Liquid wa	! istes contain	ing Thalli	um 130	mg/L		
			☐ Waste con	taining HC	C's *	1000	mg/kg		
L			(*) HO	C's as def	ined in 40	CFR 268 Appendix I	Ш.		
must be complet	ed and the correspond	If your waste is packaged in lab packs ding numbers must be listed also. If the rs and the respective waste codes.	s and does not co waste is packa	ontain any ged in lab p	waste code backs and t	s in Appendix IV (see they include waste co	e list below), th des in Appendi	e following certi x IV, then table	ification B (page 2
APPENDIX IV	codes: D009, F019,	K003, K004, K005, K006, K062, K07	1, K100, K106	P010, P0	1, P012, I	076, P078, U134, A	ND U151.	* -	
I certify under po 40 CFR 268.42	enalty of law that I pe (c)(2). I am aware th	ersonally have examined and am famili- nat there are significant penalties for sul	ar with the wast bmitting a false	e and that to	he lab paci	k does not contain an	y wastes identi	fied at	
							• • • • • • • • • • • • • • • • • • • •		
	Ger	nerator Signature				D	ate		_
Container Numb	Ders:						,	•	
		·-							
Waste analysis is	s attached where avai	ste must be treated to the applicable tree	atment standards is based upon n	s set forth in	a 40 CFR	268 Subpart D, Secti ge of the waste(s). I I	on 268,32, or I	RCRA Section 3	004 (d).
is complete and	accurate based on my	knowledge of the materials.				1	1	:	
X		mith	,			C/28	191		***
	Ger	nerator Signature	- )			7 / D	ate	Processing Street, Str	-
	\ /								



### Treatment Standards for F001-F005 Spent Solvents Disclosure Form

Underlying constituents for F001-F005. The waste material referenced in page 2 section B meets the treatment standards for the hazardous constituents maked below.

Profile Number: C5103-01

Hazardous	Т		Non waste wat		Wastewater
Waste No.	- 1	Constituents of Concern	Total Composition	TCLP	Total Composition
			mg/kg	mg/L	mg/L
F001-		Carbon tetrachloride	5.6	•	0.06
		Methylene Chloride	33	-	0.09
		Tetrachloroethylene	5.6	-	0.06
		1,1,1-Trichloroethane	5.6	-	0.05
		Trichloroethylene	5.6	-	0.05
		1,1,2-Trichloro-1,2,2-trifluoroethane	28	-	0.06
		Trichloromonofluoromethane	33	-	0.02
F002-		Chlorobenzene	5.7	-	0.06
		o-Dichlorobenzene	6.2	-	0.09
		Methylene chloride	33	-	0.09
		Methylene chloride (Pharmaceutical	-	-	0.44
	_	Industry - Wastewater Subcategory)			
		Tetrachloroethylene	5.6	-	0.06
		1,1,1-Trichloroethane	5,6	-	0.05
		1,1,2-Trichloroethane	7.6	-	0.03
		Trichloroethylene	5.6	-	0.05
		1,1,2-Trichloro-1,2,2-trifluoroethane	28	-	0.06
		Trichloromonofluoromethane	33	-	0.02
F003-		Acetone	160		0.28
2005		n-Butyl alcohol	2.6	-	5.60
		Cyclohexanone *		0.75	0.36*
	Ö	Ethyl acetate	33	-	0.34
		Ethyl benzene	. 6	-	0.06
		Ethyl ether	160		0.12
		Methanol *		0.75	5.60*
		Methyl isobutyl keytone	33		0.14
		Xylenes (total)	28	-	0.32
F004-		Cresol (m- and p- isomers)	3.2		0.77
1,004-		o-Cresol	5.6	_	0.11
		Nitrobenzene	. 14	-	0.07
F005-		Benzene	3.7		0.07
F003-		Carbon disulfide *	• *	4.8	0.014*
		2-Ethoxyethanol	INCIN		BIODG; or INCIN
		Isobutyl alcohol	170		5.60
		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	36	_	0.28
		Methyl ethyl keytone	INCIN		(WETOX or CHOX
v		2-Nitropropane	16		0.01
		Pyridine	1		0.08
		Toluene	28	<u> </u>	0.08

Note: F005 spent solvent wastes containing 2-Nitropropane and/or 2-Ethoxyethanol have treatment standards outlined in 40 CFR 268.40 and must be referenced in Table B page 2. (\*) The treatment standards for Carbon Disulfide, Cyclohexanone, and Methanol nonwastewaters are based on the TCLP and apply only to spent solvents containing one, two, or all three of the constituents. If a waste contains an of these three constituents along with any other constituents found in F001-F005, then only the treatment standards for the other constituents apply (i.e., the standards for Carbon Disulfide, Cyclohexanone, and Methanol do not apply when other constituents are present).

ERD-MO, INC. LAND DISPOSAL RESTRICTION (LDR) AND NOTIFICATION FORM

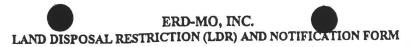
#### Universal Treatment Standards Disclosure Form

Underlying constituents for D001\*\*(low TOC, non-CWA), D002 (non-CWA), D012-D017 (nonwastewater), D018-D043 (non-CWA), and F039. The waste material referenced in Section B exceeds the treatment standards for the hazardous constituents marked below.

Check if none of the underlying hazardous constituents apply							Profile num	nber	C510	3-01	
	Constituent	мам	ww		Constituent	NAMA	WW.		Constituent	хам	ww
	Acenephitylene	3.4	1.059		Dichlorodifluoropethane	7.3	0.23		5-Nitro-tohidine	20	. 6.32
	Acrosphiheos	3.4	0.059		LI-Dichloroethene		1.059		e-Nitrophenol	1)	8.629
	Acetone	164	0.28		1,2-Dichlorostune	6	0.21		p-Nitrophenol	27	0.12
	Aceturatrile	1.0	\$.6		L1-Dichlerootylene		0.825		N-Nitrosodietrylamine	20	0.4
Н	Acetylamino(bot ene	9.7 146	4.059	-	ters-L2-Dichloroetrylene	36	0.054		N-Nitrosodimetrylamine	13	0.4
H	Acrolein	AK	1.29	l ⊢	2,4-Dichlorophenol 2,6-Dichlorophenol	14 14	8.844 8.844		N-Nikoso-di-n-busylamine	17	0.4
	Acrylamide	23	19	<b> </b> -	Li-Dichloropropune	18	8.05		N-Nixosomotyletylenine	2.3	0.4
	Acrylonicile	H	1.24	-	di-L3-Dichlorozzovylene	18	1.136		N-Nitrosomorpholima N-Nitrosopiperidine	2.3	8.4
	Aldrin	0,866	0.921	<b> </b> -	t ans-L3-Dichlorops opytene	10	0.836	IH	N-Ми взоруктойная	35 35	0.013 0.013
	4-Aminobipherof	NA	8.13		Dieldrin	0.13	0.017	IH	Peratrien	ű	0.014
	Antine	Н	8.01		Diotyl phthalate	28	0.2		Total PCBs(All Aracles)	10	0.1
	Ante econe Aranto	1.4	0.059		2,4-Dimetryl phonel	14	8.036		Pentachiorebenzene	10	0.955
H	Aphr-BHC	NA 838.8	0.36 8.00014	-	Discript phihales Discriptly phihales	n	0.047		PacDd(AE PacDdi)	8.80 \$	8.888863
H	bote-BHC	0.866	0.00014	<b> -</b>	L4-Dinitrobonsone	n 23	9.857 0.32		PocDFs(All PocDPs)	8.901	8,000075
	dota-BHC	0.066	0.823	l  -	(f-Dinitre-o-cress)	14	1.21	IH	Persechier pothere Persechier entir observance		0.055
	geme-BHC	8.846	4.0017		2,4-Dinit ophonol	166	0.12	IH	Pertiachiorophenol	1.4	9.055 9.049
	Benzene	10	0.14		2,4-Diratrotoharne	148	0.32	IH	Phonecolo	16	8.003
$\vdash$	Bong ajente acono Bonzal chierido	3.4	0.059		2,6-Dinitrotokanne	21	82.0		Phonestrone	3.6	8.859
H	Benzo(b)fluorentyme	(.)	0.11	<u> </u>	Di-moctyl phthalate p-Dimetrylaminoacobenzena	28	0.317		Phenoi	6.2	4.839
H	Benze(k)(hapranthene	ü	0.11	⊢	Dire propylate oceanies	NA 14	0.13 0.4		Photose	4.6	0.821
$\Box$	Benzo(g.b.(perylane	ü	BLOOSS .	<u> -</u>	L4-Diazone	179	NA AK	IН	Phihalic acid Phihalic solundride	20	0.055
	Benzo(a)pyrene	1.4	0.061	I –	Dipherolesine	13	1.32	IН	Provincia de procesa de la constanta de la con	. 2	0.05\$
	Browndict-for exects are	15	8.35	1 F	Diphatoriale or smine	ıs	4.92	lН	Ругина	1.5 0.2	0.093 0.067
	Metal branide	15	9.13		LI-Diphenytryckezine	XA	0.967	۱Н	Pyridine	16	0.814
	(Brancostune)		-		Distillation	6.2	6.017	l H	Safrole	22	8,001
. Н	f-Broumphonyl phonyl where n-Butrl electrol	15	229.0		Endessiten 1	1,166	6.823		\$8vex(2,4,5-TP)	7.9	0.72
H	Butyl bensyl philulate	2.6	5.6 0.017		Endorali en il Endorali en sull ala	LIJ	9,629		245-T1245-Trichlorophon-	1.9	8.72
H	2-sec-Butyl-(1-distrophenal	2.5	8.866	<b> </b> -	Zndonia in pue in	1.13	0.029		OKYACVÉC acid)		
	(Dinoseb)		0.300	<b> </b> -	Endrin eldeturde	8.13 8.13	8.8829 8.825		1.1,45-Tetrachiorebonsone	14	0.053
	Carbon disultate	AN MATCLE	3.0	<b> </b> -	Etrol acouste	20	134	ΙН	TCDD:(AETCDD:) TCDP:(AETCDP:)	0.001	8,300063
	Curbon tetrechloride	6	8.857		Etyl cyeride (Propenstitie) 368		924	ΙН	LLLI-Tetachicrostune	0.001	0.000C3 0.057
	Chlordene (alpha end genna	1.25	0,0033		Digi benzene	18	8.857	lН	LLLI-Tetatheresham		0.857
	isomers)		727		Etyl other	768	8.12	ŀН	Totachiersotylene	1 -	0.856
H	p-Chieroscaline Chierobernome	16 '6	356	1.	No (2-28 y Breazy I) phahalata	21	8.28		2.3,46-Totrachiorophenol	7.4	8.83
H	Chieroberolete	XA.	· (15)	-	Etyl authorylate	168	8.14		Telasno	18	9.96
H	3-Chiery-L3-bulediese	121	CDS7		Rhylona mádo Yamphar	MA IS	0.12 0.017	ΙН	Temphone	24	0,0095
П	Chlorodistanoustrana	. 15	4.657	-	Proceedings	3.4	0.068	ΙН	Brunolore (Tribromonétaine) LL+Trichlorobensons	. 15	1.63
	Chlorostane	6	In		Placeone	1.4	0.859	ΙН	LL)-Trichieroshane	- 15	4.155 0.154
	bis(1-Chicrosthusy)methens	12	± 303.7		Hoptachlor	1,166	8,8612	lΗ	LL3-Trichieroothere		0.654
Н	bis/1-Chioresty/jetur	6	6.633		Heytechler specide	8,866	9.016	IH	Trichler outprises	i	0.854
H	Chieroform his(2-Chieroisopropyt)other		£846		Hazachiorobouzono	14	0.055		Trichlor omorafluor amothema	n n	1.02
H	p-Calaron-cross	7.2 14	0.855		Hexachiorobulaciono	5.6	9.855		2.4.5-Trichlorophunul	7.4	9,18
Н	3-Chicrostol viral other	· XA	8.016 8.062	-	Hemathlerecycloperatelleres BuCDDs(All HaCDDs)	2.4	0.057		2.4.6-Trichlerophonel	1.4	1.035
Н	Chierometheres	×	0.19		Hacorial Hacori	0.001 0.001	6,8006G3 6,8006G3	ΙН	LL3-Trichloropropers	×	LIS
	(Mettyl chloride)		· _ \		Hexachieroethane	. 38	0.853	l	LLI-Trichker-LLI-estage-	<b>3</b>	0.857
	2-Chierosphihaluro	2.2	£ 855		Henschieropropylane .	ži	0.035		tis-(2,3-Disrompropy)	1.0	0.11
H	1-Chlorophonol	\$.7	UH-		Indono(L2,5-c,d)pyrens	3.4	8,0055	-	phosphale	<b>6.1</b>	
Н	3-Chior sprogrylana Chrysena	30	EBS		lodomotume		8.19		Virgit chiloride	-6	8.27
Н	e-Crossi	3.4 5.6	£359 €,11		Lobulyi alcohol Isodrin	170	5.6		Xylenay-All mixed insmers	. 30	. 4.12
Н	te-Cresal	5.6	in		Isosafrolo	1.066	0.A21		Ardinary	2.1 mg/TCLP	- 19.
	p-Cresol	3.2	0.77		Lapane	1.13 1.13	0.003 0.0013	ΙН	Attenic , Berina	SI MATCLE	. 14
	Optiohezensou	I.X mg/TCLP	J.X'.		Methacrylominie	н	824	ΙH	Borytean	1.6 mg/TCLP	11
	L3-Distract - Chiaraprapasa	. 15	ett .		Motumol	A.75 mg/TCLP	3.2	ΙH	Cadalan	ANIA SEATCLE	0.69
	Phylina dhrouide (LI-Dhrouashans)	15	1.921		Metapythene	LS -	198.8		Citronian (Total)	I.M mg/TCLP	2.77
	Distribution (CPD (CPD (CPD (CPD (CPD (CPD (CPD (CPD	15			Methoxychice	0.10	1.25		Cyarides (Tatal)*	·· \$96	12
Н	24D (24-Dichler subsequen	10	0.11 0.72		1-Motoyicholacutu anno 4-Motoyiana bis (2-chiara-	15	0.0055		Cytrides (Amenable)*	' M	0.06
	acrete acid)		0.74		(1-moderne en la-carra-	30	1.5		Paoride -	MA	35
	en,-DDD	9,007	0.623		Motorino chierido	36	1,009	H	Leed	0.37 mg/TCL)	. 0.49
	MD,-DDD	0.007	8.823 ···	, <b>-</b>	Motor oter keytone	ũ.	0.23	L	Morcary-Horanestownson from Ruters	LA MATCLE	MA
	SQC, CO	8.067	8.031		Metal behalf betone	23	A.H		Mercary-All Others	MAN WATCH	8.15
H	300-005	9.007	0.831		Metric methoczylate	160	0.14	H	Mickel	S.D mg/LTCLP	3.90
H	M-DDL	A.M?	8.0035		Metal metanosal man	MA	0.010		Solonism	4.16 mATCLP	CAR.
H	Diberarichiante acone	6,997 0,2	0,0039 0,055		Motort parathion	46	0.014		Silver	0.30 mg/TCLP	1.0
H	Diberria pyroce	NA	8.855 8.861	. H	Nephhelene 2-Hephhylamine	12	0.059		Stalfide .	MA	
	m-Dichloroborozone	6	1.36		e-Mitrocritico	- MA	0.53 0.27		Thelium '	I.TI MITCLE	1.4
	e-Dichlerobynesses		8.886 1	3	y-litromine	28	8.829	H	Venedium Zinc	123 mg/(TCL)	
N	p-Dichlershongene	4	2.09		Mitahanana	••	4444			STOT Nam 6.2	2.61

<sup>(</sup>a) Both Cyanidez (Total) and Cyanidez (Amenable) for nonwastewaters are to be analized using SW-846 Method 9010 or 9012 with a sample size of 10 grams and a distillation time of one hour and 15 minutes.

<sup>(\*\*)</sup> The selection of D001 constituents is only required for low TOC ignitable liquids managed in non-CWA facilities.



#### Universal Treatment Standards Disclosure Form (cont'd)

Underlying constituents for D001\*\*(low TOC, non-CWA), D002 (non-CWA), D012-D017 (nonwastewater), D018-D043 (non-CWA), and F039. The waste material referenced in Section B exceeds the treatment standards for the liazardous constituents marked below.

Check if none of the			nents apply		Profile numb	ber:		
Constituent	MW/A	ww	Constituent	NWW	WW	Constituent	NWW	ww
A22(1) Addicarb sulfonic Barban Bendiocarb Bendiocarb plienol Benomyl Burylate Carbaryl Carbendazim Carbofuran Carbofuran Carbofuran phenol Carbosulfan m-Cumenyl methylcarbamate Cycloate	1.4 0.28 1.4 1.4 1.4 1.4 1.4 0.14 1.4 0.14 1.4 1.4	0,042 0,056 0,056 0,056 0,056 0,056 0,042 0,006 0,056 0,056 0,056 0,028 0,056	Diethylene glycol, dicarbamate Dimedian Dithiocarbamates (Total) EPTC Formetanate hydrochloride Formparanate J-loda-2-propynyl n-butyl- carbamate Isolan Methiocarb Methomyl Metolcarb Mexacarbate Molinate	1 4 1,4 28 1 4 1 4 1 4 1 4 1 4 0 14 1 4 1 4	0 056 0 028 0 042 0 046 0 056 0 056 0 056 0 028 0 056 0 056 0 056	Oxamyl Pebulste o-Phenylenediamine Physostigmine Physostigmine salicylate Promecarb Propham Propoxur Provilfocarb Thiodicarb Thiophanate-methyl Tirpate Triallate Tricthylamine Vermolate	0.028 1.4 5.6 1.4 1.4 1.4 1.4 1.4 1.4 1.4 1.4 1.5	0.036 0.042 0.056 0.056 0.056 0.056 0.056 0.042 0.042 0.056 0.056 0.042

<sup>(\*)</sup> Both Cyanides (Total) and Cyanides (Amenable) for nonwastewaters are to be analized using SW-846 Method 9010 or 9012 with a sample size of

<sup>10</sup> grams and a distillation time of one hour and 15 minutes.

<sup>(\*\*)</sup> The selection of D001 constituents is only required for low TOC ignitable liquids managed in non-CWA facilities